

**\IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
Charleston Division**

**ALISHA KINGERY,
f/k/a ALISHA WILKES,
individually and on behalf of all
others similarly situated,**

Plaintiffs,

v.

Civil Action No. 2:12-cv-1353

QUICKEN LOANS, INC.,

Defendant.

**DEFENDANT QUICKEN LOANS, INC.'S
MEMORANDUM IN SUPPORT OF MOTION TO SEAL**

Defendant Quicken Loans, Inc. (“Quicken Loans”), by counsel, pursuant to Rule 7.1(a) and Rule 26.4(b) of the Local Rules of the United States District Court for the Southern District of West Virginia and the Protective Order entered by the Court on January 23, 2013 (ECF No. 39), submits this Memorandum in Support to its Motion to Seal Exhibit 3 to Defendant’s Memorandum in Opposition to Plaintiff’s Motion to Compel Rule 30(b)(6) Testimony (ECF No. 167), which contains confidential information. Specifically, Exhibit 3 to Defendant’s Memorandum in Opposition to Plaintiff’s Motion to Compel Rule 30(b)(6) Testimony contains testimony that has been designated as “CONFIDENTIAL” pursuant to the Protective Order entered by the Court and should have been filed under seal. Accordingly, for the reasons set forth below, good cause exists to seal the aforementioned confidential documents.

1. On January 23, 2013, the Court entered an agreed Protective Order in this matter (ECF No. 39).

2. On September 5, 2013, Plaintiff took the deposition of Quicken Loans' Rule 30(b)(6) Corporate Representative, Amy Bishop ("Rule 30(b)(6) Deposition").

3. On September 27, 2013, in accordance with the Protective Order, Quicken Loans designated portions of the Rule 30(b)(6) Deposition, as CONFIDENTIAL. A copy of that designation is attached as **Exhibit 1**. On October 9, Quicken Loans supplemented its designated portions of the Rule 30(b)(6) Deposition, as CONFIDENTIAL, to include information in the Errata Sheet. A copy of the supplemental designation is attached as **Exhibit 2**.

4. On October 2, 2013, Plaintiff filed a Motion to Compel Rule 30(b)(6) Testimony and Memorandum in Support ("Motion") (ECF Nos. 151 and 152).

5. In support of its opposition to Plaintiff's Motion, Quicken Loans will attach an excerpt of the Rule 30(b)(6) Deposition, which contains confidential designated testimony. A redacted version of Exhibit 3 is being attached to Quicken Loan's Opposition to Plaintiff's Motion.

6. In accordance with the Southern District of West Virginia's ECF Administrative Procedures Rule 12.3, Quicken Loans is sending, via Federal Express, an unredacted copy of Exhibit 3 to Defendant's Memorandum in Opposition to Plaintiff's Motion to Compel Rule 30(b)(6) Testimony, to the Clerk, as well as Your Honor's chambers, an envelope prominently marked as containing "PROPOSED DOCUMENTS FOR SEALING." Quicken Loans is also sending a complete copy to Plaintiff's counsel via first class mail.

Dated: October 21, 2013

Respectfully Submitted,

QUICKEN LOANS, INC.

By: /s/ John C. Lynch
Of Counsel

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CERTIFICATE OF SERVICE

I hereby certify that on this 21st day of October, 2013, I electronically filed the foregoing Memorandum in Support of Motion to Seal with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following counsel of record:

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